

March 20, 2023

VIA ELECTRONIC FILING

Public Utility Commission of Oregon
Attn: Filing Center
201 High Street SE, Suite 100
Salem, OR 97301-3398

RE: LC 82—PacifiCorp's Motion for Extension to File PacifiCorp's First Clean Energy Plan - *Expedited Consideration Requested*

PacifiCorp d/b/a Pacific Power hereby submits for filing its Motion for Extension to File PacifiCorp's First Clean Energy Plan. PacifiCorp intended to file its First Clean Energy Plan concurrently with its 2023 IRP. However, an extension is being requested to align with the timing of the initial 2023 IRP 60-day comment period. The Company requests expedited consideration of the motion as the filing date of the 2023 IRP is March 31, 2023.

Please direct any inquiries about this filing to Stephanie Meeks, Regulatory Project Manager, at (503) 813-5867.

Sincerely,



Matthew McVee
Vice President, Regulatory Policy and Operations

Enclosures

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

LC 82

In the Matter of

PACIFICORP, dba PACIFIC POWER,

2023 Integrated Resource Plan

**MOTION FOR EXTENSION TO
FILE PACIFICORP’S FIRST
CLEAN ENERGY PLAN**

Expedited Consideration Requested

I. INTRODUCTION

PacifiCorp d/b/a Pacific Power (PacifiCorp or Company) respectfully requests that the Public Utility Commission of Oregon (Commission) extend by 60 days the date by which the Company will file its 2023 Clean Energy Plan (CEP). PacifiCorp proposes to file its CEP concurrently with the May 2023 deadline to file an addendum, if needed, to the Company’s 2023 Integrated Resource Plan (IRP), in compliance with Order 23-011. The Company requests expedited consideration of the motion as the filing date of the 2023 IRP is March 31, 2023.¹

II. BACKGROUND

Under ORS 469A.415(3)(a), PacifiCorp must file its first CEP no earlier than January 1, 2022, and no later than 180 days after its next IRP is filed. Under OAR 860-27-0400(3), PacifiCorp is required to file its next IRP within two years of the acknowledgment of its prior IRP, which occurred on May 23, 2022.² Thus, the deadline for filing PacifiCorp’s next IRP in Oregon is May 2024. PacifiCorp has been clear, however, that it plans to advance this date and file its 2023 IRP by March 31, 2023.

¹ OAR 860-001-420(6) requires that a moving party requesting expedited treatment confer with parties in the proceeding regarding the motion. However, as of the date of filing, there are no parties in this proceeding. The Company has served its Motion for Extension to File on parties in Docket No. LC 77, PacifiCorp’s 2021 Integrated Resource Plan, and Docket No. UM 2225, the Commission’s Investigation into Clean Energy Plans.

² *In the Matter of PacifiCorp, dba Pacific Power, 2021 Integrated Resource Plan*, Docket No. LC 77, Order No. 22-178 (May 23, 2022).

In Order 22-206 in docket UM 2225, the Commission directed PacifiCorp and Portland General Electric Company to file their CEPs concurrently with their next IRPs as a “chapter, appendix or accompanying filing.”³ The Commission also provided that, upon request, it could “authorize either utility to file the CEP, or specific components of the CEP, within up to 180 days of filing the IRP if the utility demonstrates that filing the CEP with the IRP would create an undue burden.”⁴

In December 2022, PacifiCorp sought a waiver of IRP Guideline 2(c) requiring the Company to file a draft IRP for public review and comment in advance of filing the final IRP.⁵ PacifiCorp explained that, given the significant burdens associated with preparation of its first CEP, filing a complete draft 2023 IRP in advance of its target filing date of March 31, 2023 was not possible.

In Order 23-011, the Commission granted a partial waiver of Guideline 2(c), allowing PacifiCorp to file its 2023 IRP on March 31, 2023 without filing a draft IRP in advance of this date.⁶ Relying on the flexibility of the IRP process, however, the Commission created an initial 60-day review period for the 2023 IRP, allowing parties to submit comments within 30 days of the filing and allowing PacifiCorp to respond to those comments, incorporate additional stakeholder feedback, and file an IRP addendum, if necessary, by the end of May 2023.⁷

III. REQUEST FOR EXTENSION

To comply with the directives of ORS 469A.415(3)(a) and Orders 22-206 and 23-011, the Company is seeking a 60-day extension for filing its CEP. Given the unique facts and

³ *In the Matter of the Public Utility Commission of Oregon Threshold Planning Framework*, Docket No. UM 2225, Order No 22-206, Appendix A at 17 (June 3, 2022).

⁴ *Id.*

⁵ Docket No. LC 77, PacifiCorp’s Motion for Waiver of Integrated Resource Plan Guideline 2(c) (Dec. 13, 2022).

⁶ Docket No. LC 77, Order No. 23-011 (Jan. 26, 2023).

⁷ *Id.*, Appendix A, at 7.

circumstances PacifiCorp faces this year as it works to complete its first CEP, it would be an undue burden to file the CEP concurrently with PacifiCorp's IRP filing on March 31, 2023.

PacifiCorp's proposal to file its CEP concurrently with a May 2023 IRP addendum, if needed, is a reasonable alternative, allowing PacifiCorp to complete a robust CEP and allowing stakeholders continued opportunities to engage in the development of both the 2023 IRP and the CEP. The basis for this motion is set forth below.

First, PacifiCorp's status as a multi-state utility has added complexity to the development of its first CEP and has precluded the CEP's completion by March 31, 2023. PacifiCorp's system-wide, six-state asset planning process is already a major undertaking, especially given the changing nature of the energy sector and growing resource adequacy issues. The Company's CEP is based on the IRP and requires PacifiCorp to show a plan to meet the clean energy targets of House Bill (HB) 2021, including incorporating a required amount of small-scale renewable resources, community benefits and impacts, and study options for community based renewable resource development.

Completing the IRP process on a six-state basis while also developing the new resource planning process for the CEP has proved challenging. While PacifiCorp appreciates the CEP guidance the Commission provided in Orders 22-390 and 22-446, the Company has had less than six months to incorporate this guidance while concurrently completing its multi-state IRP.⁸ With an additional 60 days, the Company believes it can complete its CEP in a manner that is fully consistent with the Commission's guidance. In summary, it would be an undue burden for

⁸ *In the Matter of Public Utility Commission of Oregon Near-term Guidance on Analytical Improvements in the First Clean Energy Plans and Associated Integrated Resource Plans*, Docket No. UM 2225, Order No. 22-390 (Oct. 25, 2022); Order No. 22-446 (Nov. 14, 2022).

PacifiCorp to file its first CEP by March 31, 2023, because it has had insufficient time to complete its first CEP in tandem with its multi-state IRP.

Of specific concern is that the load forecasts in PacifiCorp's 2023 IRP are indicating changes in future Oregon load that would lead to additional allocation of system resources. This impacts the Company's analysis of both forecasted emissions compliance under HB 2021 and small scale renewable compliance targets. Additional time to file the CEP will allow PacifiCorp to evaluate options to meet the emissions limits in HB 2021.

Furthermore, PacifiCorp's 2023 IRP is indicating a need for new technology to meet PacifiCorp's obligations. These obligations include compliance with HB 2021, while serving customers on demand, complying with mandatory reliability standards, and satisfying PacifiCorp's federal obligations as a transmission provider, just to name a few. Additional time to file the CEP will provide an opportunity to analyze the benefits and risks of reliance on new technologies, including the HB 2021 compliance impacts if new technologies are not operational by the date needed or do not become viable for utility use.

Second, even though PacifiCorp is not required to file its 2023 IRP by March 31, 2023 in Oregon, the schedule dictated by the Company's multi-state filing requirements and burgeoning resource needs means that it cannot simply push back the 2023 IRP filing by 60 days to allow for concurrent filing of its first CEP with the 2023 IRP in May 2023. It is helpful to Oregon stakeholders for PacifiCorp to maintain the March 31, 2023 filing date for the 2023 IRP, even without the completed CEP, because filing the IRP sooner facilitates HB 2021 implementation.

Third, PacifiCorp's proposal to file its first CEP concurrently with a May 2023 addendum is a solution that fits the unique procedural schedule of the 2023 IRP, as dictated by Order 23-011. In setting an initial 60-day comment and response period, the Commission recognized the

flexibility of the IRP process.⁹ The Company’s request to file its first CEP with a May 2023 IRP addendum is a reasonable approach to meeting the Commission’s direction to file the IRP and CEP concurrently, while providing the Company the time it needs to incorporate the Commission’s guidance from docket UM 2225 into its first CEP. PacifiCorp’s stakeholder process on the CEP will continue during the 60-day period, including an April 28, 2023 meeting in its ongoing CEP engagement series, which will include a preview of the Company’s compliance path.

Fourth, filing the CEP prior to the May 2023 IRP Addendum deadline from Order 23-011 could result in inefficient processes, potential methodological differences, and prevent a more robust and thoughtful CEP. PacifiCorp agrees with the general consensus in docket UM 2225 that the “next IRP and first CEP filed by each of the utilities will be the most consequential and important filings in laying out the roadmap to the first 2030 compliance target.”¹⁰ Whether increased electrification (from new loads, electric vehicle adoption, or new building requirements), the amount and timing of increased transmission and distribution capacity (inside Oregon and beyond), regional market developments (such as the California Independent System Operator’s Extended Day Ahead Market), evolving federal requirements (either from the Inflation Reduction Act, Ozone Transport Rule or Regional Haze Rule), or incorporating new technologies (pumped storage and small nuclear facilities, to name only two)—it is a dynamic time for Oregon’s energy sector. A May 2023 filing date for both an IRP Addendum and the CEP facilitates the best possible outcome for PacifiCorp’s customers, ensuring that the CEP and the IRP remain fully aligned.

⁹ Docket No. LC 77, Order No. 23-011, App. at 5.

¹⁰ Docket No. UM 2225, Community Renewable Energy Association, Oregon Solar and Storage Industries Association, and NewSun Energy LLC Application for Rehearing or Reconsideration, at 5 (Dec. 23, 2022).

IV. CONCLUSION

PacifiCorp requests the Commission grant a limited extension to allow the Company to file its CEP when it files a May 2023 IRP addendum. The Company requests expedited consideration of this motion as the filing date of the 2023 IRP is March 31, 2023.

Respectfully submitted this 20th day of March 2023.

/s/ Carla Scarsella

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